

Jonathan Schwalb, Esq.
Friedman Vartolo LLP
85 Broad Street, Suite 501
New York, New York 10004
Attorneys for Rushmore Loan Management
Services, LLC, as servicer for U.S. Bank Trust
National Association, as Trustee of Dwelling Series IV Trust
P: (212) 471-5100
Bankruptcy@FriedmanVartolo.com

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

-----X	
	:
IN RE:	: CASE NO.: 19-30465-JKS
	:
	: CHAPTER: 13
	:
William N. Woolis	: HON. JUDGE.:
Lori A. Woolis	: John K. Sherwood
	:
Debtors	:
	:
-----X	

**CERTIFICATION OF DEBTORS' DEFAULT AND REQUEST FOR ENTRY OF AN
ORDER VACATING THE AUTOMATIC STAY AS TO REAL PROPERTY AS TO
SECURED CREDITOR**

I Brian Gaske hereby certify as follow:

1. I am a Assistant Vice President for Rushmore Loan Management Services, LLC as Servicer for U.S. Bank Trust National Association as Trustee of the Dwelling Series IV Trust, a secured creditor of the debtor.
2. Secured Creditor filed a Motion for Relief from the Automatic Stay on August 27, 2020. Subsequently, Secured Creditor resolved the issues with the Debtors' attorney and an Order was entered on October 20, 2020 (Docket #45) resolving the Motion for Relief from the Automatic Stay.

3. Secured Creditor filed a Creditor's Certification of Default on May 7, 2021.
Subsequently, Secured Creditor resolved the issues with the Debtors' attorney and an Order was entered on September 29, 2021 (Docket #81) resolving the Certification of Default. The duly entered Order provided for, among other things, the Debtors make monthly trial payments beginning September 1, 2021. The remaining terms of the Order are set forth in the annexed **Exhibit A**, a true copy of the Order resolving the original Motion for Relief from Stay. The Court's attention is respectfully directed to the default clause of the Order providing for the submission of the within Certification and form of Order upon default.
4. As of the execution of this certification, according to Secured Creditor's records, the Debtors have failed to comply with the terms of the Order by failing to maintain post-petition monthly payments due for October 1, 2021, through February 1, 2022, x \$2,161.08, less suspense in the amount of \$1,909.17. The total amount past due is \$8,896.23. The above-mentioned payments are more than 30 days delinquent.
5. Simultaneously with the submission to the Court of the within Certification and proposed form of Order, copies of these documents are being served upon the Debtors, Debtors' attorney, and the Standing Trustee.
6. Based on the above, the Debtors have failed to meet the conditions to continue the Automatic Stay, and it is respectfully requested that this Court enter an Order Vacating the Automatic Stay as to Real Property as to Secured Creditor.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: 3/15/22


Signature **Brian Gaske**

Jonathan Schwalb, Esq.
Friedman Vartolo LLP
85 Broad Street, Suite 501
New York, New York 10004
Attorneys for Rushmore Loan Management Services, LLC
as Servicer for U.S. Bank Trust National Association as
Trustee of Dwelling Series IV Trust
P: (212) 471-5100
Bankruptcy@FriedmanVartolo.com

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

-----X	
	:
IN RE:	: CASE NO.: 19-30465-JKS
	:
	: CHAPTER: 13
	:
William N. Woolis	: HON. JUDGE.:
Lori A. Woolis	: John K. Sherwood
	:
Debtors	:
	:
-----X	

CERTIFICATION RE POST CONSENT ORDER PAYMENT HISTORY

Brian Gaske of full age, employed as Assistant Vice President by
Rushmore Loan Management Services, LLC as Servicer for U.S. Bank Trust National
Association as Trustee of Dwelling Series IV Trust, hereby certifies the following information:

Property Address: 631 Sixth Avenue, Lyndhurst, NJ 07071

Mortgage Holder: Rushmore Loan Management Services, LLC as Servicer for U.S. Bank Trust
National Association as Trustee of Dwelling Series IV Trust

Mortgagor(s)/Debtor(s): William N. Woolis and Lori A. Woolis

POST CONSENT ORDER PAYMENTS (Entered December 13, 2020)

Amount Due	Due Date	Mo/Yr Payment Applied	Amount Received	Date of Payment	Running Suspense
			\$1,230.00	08/19/2021	\$1,893.65
			\$1,244.07	09/24/2021	\$3,137.72
\$2,458.55	09/01/2021			Payment from suspense	\$679.17
		Returned-NSF	\$2,458.55	10/29/2021	\$679.17
			\$1,230.00	02/23/2022	\$1,909.17
\$2,161.08	10/01/2021				\$1,909.17
\$2,161.08	11/01/2021				\$1,909.17
\$2,161.08	12/01/2021				\$1,909.17
\$2,161.08	01/01/2022				\$1,909.17
\$2,161.08	02/01/2022				\$1,909.17
Total: \$10,805.40					\$1,909.17

Regular monthly payments 5 mos. x \$2,161.08 (10/2021-02/2022)– suspense of (\$1,909.17) = \$8,896.23 of March 1, 2022

Current monthly payment is comprised of:

Principal & Interest	\$ 1,256.17
R.E. Taxes	\$ 904.91
Insurance	\$0.00
Late Charge	\$0.00
Other	\$0.00
TOTAL	\$ 2,161.08

If the monthly payment has changed during the pendency of the case, please explain (attach separate sheet(s) if necessary): Notices of Mortgage Payment Change filed with Court when applicable.

Pre-petition arrears: N/A

I certify under penalty of perjury that the foregoing is true and correct.

3/15/22
Date


Signature
Brian Gaske